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March 2, 2021

VIA ECF

Hon. John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

The conference scheduled for March 8, 2021 is adjourned.

SO ORDERED

March 2, 2021
New York, NY

/s/ John G. Koeltl
John G. Koeltl
U.S.D.J.

Re: *Qlay Co. v. Adajay, et al.*, Case No. 20-cv-9776 (“*Qlay I*”)
***Qlay Co. v. 2845131461, et al.*, Case No. 20-cv-9778 (“*Qlay II*”)**
***Qlay Co. v. aidediandi, et al.*, Case No. 20-cv-9781 (“*Qlay III*”)**
***Qlay Co. v. Angels in tales Store*, Case No. 20-cv-9782 (“*Qlay IV*”)**
Status Letter

Dear Judge Koeltl,

We represent Plaintiff Qlay Co. (“Plaintiff”), in the above-referenced related matters.¹ Plaintiff filed these actions on November 20, 2020, and respectfully provides the instant status updates:

Qlay I

To date, seven (7) Defendants have been voluntarily dismissed from the action: AMAZING BOY, ChenMeiZhiLeiZhiPin, Compression ex, Hai Lin Fashion, huangqingshan better, MiinYuaa Co Ltd and TaneshGa. (Dkts. 17, 19.) Plaintiff has reached agreements-in-principle with nine (9) Defendants: Ishanqudi, lizhenhan, Mengtian Gu, Min.Gui, QIGNSHAN, RighLeft, ShaoYou, Souda Mino and Tang.Chao. The remaining sixty-six (66) Defendants are in default.

Qlay II

To date, sixteen (16) Defendants have been voluntarily dismissed from the action: Anime Bag World, beautiful boy, chaorishang, dandanlili, huangqian0012, Huohuasz, jiayulei258456, kjsoidur8, liukesong, liumeijuan, lixia trade, magic cosmalls, sunye Store, XIONGJIANGUO, xujiang9888 and zhanghongxue. (Dkts. 16, 18, 20, 22, 24.) Plaintiff has reached agreements-in-principle with seven (7) Defendants: azhongshangdian, Building Dream Yan, hangdjd, Hellen, TIANYUXIEZI, Wcomhlis and ZIYAO Shoe store. The remaining sixty-one (61) Defendants are in default.

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff’s Complaints or Applications.

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Olay III

To date three (3) Defendants have been voluntarily dismissed from the action: bidashoes, hiem and michalle. (Dkt. 17.) The remaining eighty-four (84) Defendants are in default.

Olay IV

All seventy-one (71) Defendants are in default.

Based on the foregoing, Plaintiff respectfully requests that the pretrial conference currently scheduled for March 8, 2021 be indefinitely adjourned, and Plaintiff anticipates filing its motions for default judgment by no later than April 2, 2021.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

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